

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

In re:	§	
	§	CASE NO. 18-66575 pmb
Fredegra LaShawan Brown	§	
<i>dba Atlanta Auction Access Inc.</i>	§	CHAPTER 11
	§	
Debtor	§	
<hr/>		
Carvana, LLC	§	CONTESTED MATTER
	§	
Respondent	§	
v.	§	
Fredegra LaShawan Brown, Debtor	§	
	§	
Thomas Wayne Dworschak, US Trustee	§	
	§	
	§	
	§	

**OBJECTION TO MOTION FOR ORDER AUTHORIZING PROTECTION PAYMENTS TO  
SECURED CREDITORS**

COMES NOW, Carvana, LLC (Carvana), and objects to the Debtor's motion for the reasons set forth below:

1.

Carvana, holds a first priority lien on the Certificate of Title to the Debtor's 2014 BMW 5 Series.

2.

The subject vehicle was purchased on May 14, 2017 for \$49,045.22 with interest at 21.98% and monthly payments of \$594.00.

3.

The Debtor has made no payments since the filing of the within case on October 1, 2018 and the loan is contractually due for the October 13, 2018 payment.

4.

The Debtor's proposed payment is insufficient to provide Carvana, LLC with adequate protection.

THEREFORE, based upon the above and foregoing facts Carvana objects to the proposed treatments.

This 13<sup>th</sup> day of June 2019

Respectfully Submitted

**/s/Richard B. Maner**

Richard B. Maner, GA Bar No. 486588

Attorney for Respondent

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**CERTIFICATE OF SERVICE**

This is to certify that I have served a copy of **OBJECTION TO MOTION** electronically. Those not served electronically have been served by depositing same in the United States Mail in a properly addressed envelope to each with adequate postage thereon as follows:

Fredegra LaShawan Brown  
9830 Cedar Grove Road  
Fairburn, GA 30213

Joseph Chad Brannen  
The Brannen Firm, LLC  
Suite G  
7147 Jonesboro Road  
Morrow, GA 30260

Office of US Trustee  
362 United States Courthouse  
75 Spring Street SW  
Atlanta, GA 30303

This the 19<sup>th</sup> day of April 2019

**/s/Richard B. Maner**

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